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MEMO ENDORSED.

April 28, 2025

VIA CM/ECF

Hon. Ona T. Wang, U.S.M.J.
U.S. District Court for the
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: *Palladino v. Guardian Vet et al.* – No. 1:25-cv-00355(VSB) (OTW)

Dear Judge Wang:

We represent the Plaintiff and putative collective/class in the above-mentioned matter. We, along with counsel for Defendants, file this joint letter motion requesting a stay of discovery and motion practice in this case while the Court rules on Defendants' fully briefed Motion to Dismiss (ECF Nos. 42-51). This Court has the ability to stay discovery and relevant motion practice due to its "power to stay proceedings," which is "incidental to the power inherent in every court to control the disposition of the cases on its docket with economy of time and effort for itself, for counsel, and for litigants." *Hoschke v. Belfast Gastro Pub Inc.*, No. 23 Civ. 06059 (JMW), 2025 WL 1070235, at *2 (E.D.N.Y. Apr. 9, 2025). While the stay is in place, Defendants have agreed to toll the FLSA statute of limitations for putative FLSA collective members.

The Parties' agreement is described in more detail in the stipulation enclosed as **Exhibit A**. The Parties respectfully request that the Court to so-order the enclosed stipulation if it finds the terms acceptable.

We thank the court for its time and consideration of this joint request.

Sincerely,

/s/ Armando A. Ortiz

Armando A. Ortiz

Enclosure

CC: Counsel for Defendants (via CM/ECF)

Application **GRANTED**. The Clerk of Court is respectfully directed to close ECF Nos. 50 and 54.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ona T. Wang".

Ona T. Wang
U.S.M.J.

Apr. 29, 2025